West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Thomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Update

R13-2532D

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Huntington Alloys
Huntington Facility
011-00007

John A. Benedict
Director

Issued: April 13, 2011 • Effective: April 13, 2011

This permit will supercede and replace Permit R13-2532C.

Facility Location: Huntington, Cabell County, West Virginia
Mailing Address: 3190 Riverside Dr.
Huntington, WV 25705
Facility Description: Scrap Metal Recycling
NAICS Codes: 423930
UTM Coordinates: 379.200 km Easting • 4,252.300 km Northing • Zone 17
Permit Type: Class II Administrative Update
Description of Change:
Installation of equipment (kilns, burners, crusher, shot blaster, wash water annd rinse water burners, and control equipment) to recycle scrap metal by sizing, cleaning, and drying. Operation will not increase throughput or capacity of existing equipment.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

Table of Contents

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
2S	TB1	Tumble Blaster	2002	15,000 lb/hr	Baghouse
4S	PC	Plasma Cutter	2002	5,000 lb/hr	N
5S	AC1	Arc Cutter	2002	15,000 lb/hr	N
6S	AC2	Arc Cutter w/additional booth	2006	15,000 lb/hr	N
7S	CB	Cabinet Blaster	2002	35,000 lb/hr	Baghouse
Scrap Metal Recycling					
TP-2-P	TP-2-S	Plasma Cutter	2011	5,000 lb/hr	None
TP-7A-P	TP-7A-S	Rotary Borings Kiln 1	2011	8,000 lb/hr	Cyclone TP-7A-1C, Thermal Oxidizer TP-7A-2C, Baghouse TP-7A-3C
TP-8A-P	TP-8A-S	Rotary Borings Kiln 2	2011	8,000 lb/hr	Cyclone TP-8A-1C, Thermal Oxidizer TP-8A-2C, Baghouse TP-8A-3C
TP-7B-P	TP-7B-S	Rotary Kiln 1 Burners	2011	2.0 MM Btu/hr	None
TP-8B-P	TP-8B-S	Rotary Kiln 2 Burners	2011	2.0 MM Btu/hr	None
TP-9-P	TP-9-S	Crusher	2011	7,040 lb/hr 8,975 ton/yr	ESP TP-9-C
TP-10-P	TP-10-S	Shot/Tumbler Blaster	2011	15,000 lb/hr	(1) Baghouse TP-10-C
TP-11-P	TP-11-S	Wash Water Burner	2011	0.83 MM Btu/hr	None

1.0 Emission Units

TP-12-P	TP-12-S	Rinse Water Burner	2011	0.44 MM Btu/hr	None
(1) Baghouse TP-10-C in addition to controlling the Shot/Tumble Blaster Process GN34 TP-10-P, controls two other processes: Tumble Blaster TP-1-P and Cabinet Blaster TP-6-P.					

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**$PM_{2.5}$**	Particulate Matter less than 2.5µm in diameter
CBI	Confidential Business Information	**PM_{10}**	Particulate Matter less than 10µm in diameter
CEM	Continuous Emission Monitor	**Ppb**	Pounds per Batch
CES	Certified Emission Statement	**pph**	Pounds per Hour
C.F.R. *or* CFR	Code of Federal Regulations	**ppm**	Parts per Million
CO	Carbon Monoxide	**Ppmv or ppmv**	Parts per million by volume
C.S.R. *or* CSR	Codes of State Rules	**PSD**	Prevention of Significant Deterioration
DAQ	Division of Air Quality	**psi**	Pounds per Square Inch
DEP	Department of Environmental Protection	**SIC**	Standard Industrial Classification
dscm	Dry Standard Cubic Meter	**SIP**	State Implementation Plan
FOIA	Freedom of Information Act	**SO_2**	Sulfur Dioxide
HAP	Hazardous Air Pollutant	**TAP**	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	**TPY**	Tons per Year
HP	Horsepower	**TRS**	Total Reduced Sulfur
lbs/hr	Pounds per Hour	**TSP**	Total Suspended Particulate
LDAR	Leak Detection and Repair	**USEPA**	United States Environmental Protection Agency
M	Thousand	**UTM**	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	**VEE**	Visual Emissions Evaluation
MDHI	Maximum Design Heat Input	**VOC**	Volatile Organic Compounds
MM	Million	**VOL**	Volatile Organic Liquids
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour		
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour		
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		
NSPS	New Source Performance Standards		
PM	Particulate Matter		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

2.4.1. This permit supercedes and replaces previously issued Permit R13-2532C. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2532, R13-2532A, R13-2532B, R13-2532C, and R13-2532D, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1]**

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment

and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
[WV Code § 22-5-4(a)(15)]

d. The permitee shall submit a report of the results of the stack test within sixty(60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

    1. The permit or rules evaluated, with the citation number and language;
    2. The result of the test for each permit or rule condition; and,
    3. A statement of compliance or noncompliance with each permit or rule condition.

    [WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each

occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee.**

3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal

requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Emissions from the facility shall not exceed the following:

Source	PM	
	lb/hr	tpy
Tumble Blaster 1 (TB1)	0.13	0.59
Plasma Cutter (PC)	0.5	2.19
Arc Cutter 1 (AC1)	0.05	0.21
Arc Cutter 2 (AC2)	0.05	0.21
Cabinet Blaster (CB)	0.01	0.03
Total	**0.74**	**3.23**

4.1.2 The permittee shall operate the following units within the specified parameter limits:

Source	Parameter	Limit
Tumble Blaster 1	Pounds of Shot Used	200 pounds per day
Plasma Cutter	Pounds Cut	18,000 pounds per day
Cabinet Blasting	Pounds of Shot Used	200 pounds per day
Arc Cutting	Rods Used	960 per day

4.1.3 Particulate Matter emissions from the Cabinet Blaster shall be controlled by the use of a baghouse. Said baghouse shall be designed, installed, maintained and operated in such a manner so as to reduce PM emissions from the Cabinet Blaster by at least 99.99%.

4.1.4 Particulate Matter emissions from the Tumble Blaster shall be controlled by the use of a baghouse. Said baghouse shall be designed, installed, maintained and operated in such a manner so as to reduce PM emissions from the Tumble Blaster by at least 99.99%.

4.1.5 No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air form any process source operation greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7. **[45 CSR §7-3.1.]**

4.1.6 No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule. **[45 CSR §7-4.1.]**

4.1.7 No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. **[45 CSR §7-5.1.]**

4.1.8 The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. **[45 CSR §7-5.2.]**

4.1.9. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. **[45CSR§13-5.11.]**

4.2. Testing Requirements

[Reserved]

4.3. Monitoring and Recordkeeping Requirements

4.3.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;
b. The date(s) analyses were performed;
c. The company or entity that performed the analyses;
d. The analytical techniques or methods used;
e. The results of the analyses; and
f. The operating conditions existing at the time of sampling or measurement.

4.3.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.3.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.
b. Steps taken to minimize emissions during the event.
c. The duration of the event.
d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.
f. Steps taken to correct the malfunction.
g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.3.4. In order to determine compliance with the emissions limits of condition 4.1.1 of this permit and the usage limits of condition 4.1.2 of this permit, the permittee shall maintain certifiable monthly records of the following:

4.3.4.1 The amount of shot used in the tumble blaster and cabinet blaster.

4.3.4.2 The pounds of material cut by the plasma cutter.

4.3.4.3 The number of rods used by the arc cutter.

5.0 Source-Specific Requirement - Recycled Scrap Metal

5.1. Limitations and Standards

5.1.1. **Scrap Metal Nickel and Chromium Content.** The permittee shall notify the Director in writing of any change in Nickel and/or Chromium content in the scrap metal (content now set at 60% and 25% by weight, respectively) and shall quantify the effect of the change upon air emissions.

5.1.2. **Emission Point (TP-2-S) - Plasma Cutter PM Emissions.** The emission point (TP-2-S) associated with the Plasma Cutter (TP-2-P) shall not exceed the following maximum emission rates:

Pollutant	Maximum Emission Rate	
	(lb/hr)	(ton/yr)[1]
Particulate Matter (PM)	0.50	1.75
[2] Hazardous Air Pollutants (HAP)	0.43	1.49

(1) Based on operating the Plasma Cutter 8,760 hr/yr and an emission factor of maximum mass loss of 0.5 lb/hr and average mass loss of 0.4 lb/hr.
(2) Based on a Nickel and Chromium content for the scrap metal of 60% and 25%, respectively.

5.1.3. **Control Equipment Guaranteed Collection Efficiencies.** The following control equipment shall be installed and shall have at least the guaranteed collection efficiency as listed below:

Control Device ID No.	Control Device	Emission Source	Pollutant Controlled	% Guaranteed Collection Efficiency	Comments
TP-9-C	ESP	Scrap Metal Crusher	PM	88.3	ESP to be online when Crusher is in operation.
TP-7A-C	Cyclone	Kiln 1 Exhaust	PM	99	Cyclone, Thermal Oxidizer, and Baghouse to be online when Kiln 1 is in operation.
TP-7A-2C	Thermal		VOC	99	
TP-7A-3C	Baghouse		PM	99	
TP-8A-C	Cyclone	Kiln 2 Exhaust	PM	99	Cyclone, Thermal Oxidizer, and Baghouse to be online when Kiln 2 is in operation.
TP-8A-2C	Thermal		VOC	99	
TP-8A-3C	Baghouse		PM	99	
TP-10-C	Baghouse	Shot Blaster	PM	99.9	Baghouse to be online when Shot Blaster is in operation.

5.1.4. **Scrap Metal Processing Rates.** The following hourly and annual scrap metal processing rates shall not be exceeded:

Equipment Unit ID	Equipment Name/Type	Maximum Processing Rate		Comments
		(lb/hr)	(ton/yr)	
TP-2-P	Plasma Cutter	5,000	21,900	Air Pollutant Emission Rates Calculated Based on Hourly and Annual Scrap Metal Processing Rates.
TP-9-P	Scrap Metal Crusher	7,040 (1)	8,975 (1)	
TP-10-P	Shot/Tumble	15,000	3,000	
TP-7A-P	Kiln 1	8,000	35,040	
TP-8A-P	Kiln 2	8,000	35,040	

(1) Crusher hourly and annual scrap metal processing rates can not be increased for five (5) years from the date of issuance for R13-2532D. These rates were set here such that the 45CSR13 Modification Permitting Threshold limits of 2 lb/hr and 5 ton/yr for HAP emissions were not crossed.

5.1.5. **Emission Point (TP-9-S) - Crusher PM Controls.** The ESP (Control Device TP-9-C) shall be online and good operating condition at all times during the operation of the scrap metal Crusher (Emission Unit TP-9-P).

5.1.6. **Emission Point (TP-9-S) - Crusher PM Emissions.** The emission point (TP-9-S) associated with the Scrap Metal Crusher (Emission Unit TP-9-P) shall not exceed the following maximum emission rates:

Pollutant	Maximum Emission Rate	
	(lb/hr)(1) (2)	(ton/yr)(1) (2)
Particulate Matter (PM)	1.75	2.20
(3) Hazardous Air Pollutants	1.49	1.90

(1) After controls [Electrostatic Precipator (ESP) (Control Device ID No. TP-9-C)]. Based on an ESP control/removal efficiency of 88.3%.
(2) Based on processing 7,040 lb/hr and 8,975 ton/yr of scrap metal.
(3) Based on a Nickel and Chromium content for the scrap metal of 60% and 25%, respectively.

5.1.7. **Maximum DHI Rates - NG Burner Equipment.** The following burner equipment shall combust only natural gas and shall not exceed the maximum design heat input (DHI) rates given below:

Emission Unit ID	Emission Point ID	Equipment Piece	Maximum DHI Rate (MM Btu/hr)	Comments
TP-11-P	TP-11-S	Wash Water Burner	0.83	Provides hot water to wash dirt, oil, & grease from scrap metal.
TP-12-P	TP-12-S	Rinse Water Burner	0.44	Provides hot water to rinse the scrap metal once it is washed.
TP-7B-P	TP-7B-S	Rotary Kiln 1 Burner Set (4 Burners/Set)	2.0	Provides indirect heat to Kiln 1 (TP-7A-P).
TP-8B-P	TP-8B-S	Rotary Kiln 2 Burner Set (4 Burners/Set)	2.0	Provides Indirect heat to Kiln 2 (TP-8A-P).
-----	TP-7A-S	Smoke Hood Burner	0.75	Located on the exit side of Kiln 1 (TP-7A-P). Vents into Kiln 1's exhaust stream/emission point.
-----	TP-8A-S	Smoke Hood Burner	0.75	Located on the exit side of Kiln 2 (TP-8A-P). Vents into Kiln 1's exhaust stream/emission point.

5.1.8. **Emission Point (TP-11-S) - Water Wash Burner – NG Combustion Emissions.** Emission point (TP-11-S) associated with the Water Wash Burner (Emission Unit TP-11-P) shall not exceed the following maximum emission rates:

Pollutant	Maximum Emission Rate	
	(lb/hr)	(ton/yr)[1]
Nitrogen Oxides (NO_x)	0.09	0.36
Carbon Monoxide (CO)	0.07	0.30

(1) Based on operating the Water Wash Burner 8,760 hr/yr.

5.1.9. **Emission Point (TP-12-S) - Rinse Water Burner – NG Combustion Emissions.** Emission point (TP-12-S) associated with the Rinse Wash Burner (Emission Unit TP-12-P) shall not exceed the following maximum emission rates:

Pollutant	Maximum Emission Rate	
	(lb/hr)	(ton/yr)[1]
Nitrogen Oxides (NO_x)	0.05	0.19
Carbon Monoxide (CO)	0.04	0.16

(1) Based on operating the Rinse Wash Burner 8,760 hr/yr.

5.1.10. **Emission Point TP-10-P - Shot Blast PM Controls.** The Baghouse (Control Device TP-10-C) shall be online and good operating condition at all times during the operation of the Shot Blaster (Emission Unit TP-10-P).

5.1.11. **Emission Point TP-10-P - Shot Blast PM Emissions.** Emission point (TP-10-S) associated with the Shot Blaster (Emission Unit TP-10-P) shall not exceed the following maximum emission rates:

Pollutant	Maximum Emission Rate	
	(lb/hr)[1] [2]	(ton/yr)[1] [2]
Particulate Matter (PM)	0.26	0.05
[3] Hazardous Air Pollutants (HAPs)	0.04	0.01

(1) After controls [Baghouse (Control Device TP-10-9C)]. Based on a Baghouse control/removal efficiency of 99.9%.
(2) Based on processing 15,000 lb/hr and 6.00 MM lb/yr of scrap metal.
(3) Based on a Nickel and Chromium content for the scrap metal of 60% and 25%, respectively.

5.1.12. **Emission Points TP-7B-P and TP-8B-P – Kiln Burners – NG Combustion Emissions.** Each of the two (2) emission points (TP-7B-S and TP-8B-S) associated with the two (2) Rotary Kiln Burner Sets [TP-7B-P and TP-8B-P; four (4) burners per burner set; each burner set providing indirect heat to one kiln] shall not exceed the following maximum emission rates:

Pollutant	Max. Emission Rate Per Emission Point	
	(lb/hr)	(ton/yr)[1]
Nitrogen Oxides (NO_x)	0.20	0.86
Carbon Monoxide (CO)	0.17	0.72

(1) Based on operating each Rotary Kiln Burner 8,760 hr/yr.

5.1.13. **Emission Points TP-7A-P – Kiln 1 Exhaust Controls**. The Cyclone (TP-7A-1C), Thermal Oxidizer (TP-7A-2C), and Baghouse (TP-7A-3C) shall be in good operating condition and online at all times during the operation of the Rotary Boring Kiln 1 (Emission Unit TP-7A-P).

5.1.14. **Emission Points TP-8B-P – Kiln 2 Exhaust Controls**. The Cyclone (TP-8A-1C), Thermal Oxidizer (TP-8A-2C), and Baghouse (TP-8A-3C) shall be in good operating condition and online at all times during the operation of the Rotary Boring Kiln 2 (Emission Unit TP-8A-P).

5.1.15. **Emission Points TP-7A-P and TP-8B-P – Kiln Exhaust Emissions.** Each of the two (2) emission points (TP-7A-S and TP-8A-S) associated with two (2) Rotary Boring Kilns [Kiln #1 (TP-7A-P) and Kiln 2 (TP-8A-P)] shall not exceed the following maximum pollutant rates:

Pollutant	Max. Pollutant Rate Per Emission Point	
	(lb/hr)[1]	(ton/yr)[1] [2]
Particulate Matter (PM)	0.01	0.01
Sulfur Dioxide (SO_2)	0.80	2.46
Nitrogen Oxides (NO_x)	0.27	1.18
Carbon Monoxide (CO)	0.23	0.99
Volatile Organic	0.80	3.55

(1) After controls [one (1) Cyclone, one (1) Thermal Oxidizer, and one Baghouse per each kiln].

(2) Based on operating each Rotary Burn-off Kiln 8,760 hr/yr.

5.1.16. **Fuel Burning Equipment Opacity Limit – NG Burner: Wash Water, Rinse Water, Kiln 1, Kiln 2.** No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. **[45CSR§2-3.1.]**

5.1.17. Quarterly (every three months) opacity checks shall be performed per the test requirement given in Section 5.3.1. for the fuel burning equipment listed in 5.1.16. above.

5.1.18. **Fuel Burning Unit Emission Rate Limitation – NG Burner Equipment: Wash Water, Rinse Water, Kiln 1, Kiln 2.**

No person shall cause, suffer, allow, or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:

For Type 'b' fuel; burning units, the product of 0.09 and the total design heat inputs for such units in millions B.T.U.'s per hour, provided however that no more than six hundred (600) pounds per hour of particulate matter shall be discharged into the open air from all such units. **[45CSR§2-4.1.b]**

[45CSR§2-4.1.]

5.1.19. **Process Opacity Limitation – Plasma Cutter, Crusher, Shot Blaster, Kiln 1, and Kiln 2.**
No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7. **[45CSR§7-3.1.]**

5.1.20. Quarterly (every three months) opacity checks shall be performed per the test requirements given in Section 5.3.1. for the process equipment listed in 5.1.19. above.

5.1.21. **Process PM Emission Weight Limitation – Plasma Cutter, Crusher, Shot Blaster, Kiln 1, and Kiln 2.**
No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

[45CSR§7-4.1.]

5.1.22. **Sulfur Dioxide (SO_2) In-stack Concentration Limitation – Kiln 1 and Kiln 2 Exhausts.**
No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provide in subdivisions 4.1a. through 4.1.e.

[45CSR§10-4.1.]

5.1.23. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. **[45CSR§13-5.11.]**

5.1.24. At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Secretary thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or other tests in the Secretary may specify shall be conducted to determine compliance. **[45CSR§13-6.1.]**

5.1.25. The Secretary may suspend or revoke a permit or general permit registration if, after (6) months from the date of issuance, the holder of the permit cannot provide the Secretary, at the Secretary's request, with written proof of a good faith effort that construction, modification, or relocation, if applicable, has commence. Such proof shall be provided no later than thirty (30) days after the Secretary's request. If construction or modification of a stationary source is discontinued for a period of eighteen (18) months or longer, the Secretary may suspend or revoke the permit or general permit registration. **[45CSR§13-10.2.]**

5.2. Monitoring Requirements

5.2.1. The permittee shall visually inspect each particulate matter capture system, points of capture or collection; filter vents, ducts, connections, housings and associated air pollution control devices for malfunction, leaks and effective operation every three (3) calendar months. The permittee shall perform preventive or corrective action as expeditiously as possible to ensure particulate matter capture system integrity and effective operation. Records of such inspection shall be maintained in accordance with Section 3.4.1. of this permit.

5.2.2. The permittee shall visually inspect the operation of each exterior baghouse cleaning system mechanism, interior cleaning equipment and the clean side of bags for evidence of leaks or failure once every thirty (30) calendar days of operation. The permittee shall perform preventive or corrective action as expeditiously as possible to ensure effective operation of baghouse cleaning system mechanism, interior cleaning equipment and filter fabric integrity. The permittee shall record the date of such inspections and document any baghouse cleaning system repair, filter fabric replacement, preventive or corrective action taken. Records of such inspection shall be maintained in accordance with Section 3.4.1. of this permit.

5.3. Testing Requirements

5.3.1. **Opacity Testing.** To demonstrate compliance with the opacity requirements in Section 5.1.17. (10% opacity or less) and in Section 5.1.20. (20% opacity or less), the permittee shall conduct quarterly (every 3 months) emission observations in accordance with Method 22 of 40 CFR 60, Appendix A. These observations shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission points have visible emissions using the procedures outlined in 40 CFR 60 Appendix A, Method 22. If sources of visible emissions are identified during the testing survey, the permittee shall conduct an opacity evaluation in accordance with 40 CFR 60, Appendix A, Method 9, within 24 hours. A 40 CFR 60, Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the emission source(s) is/are operated at normal operating conditions with no visible emission being observed.

5.4. Recordkeeping Requirements

5.4.1. **Records, Operation and Compliance.**

a. To demonstrate compliance with Sections 5.1.1. and 5.1.2., a person designated by a Responsible Official or Authorized Representative shall maintain a file documenting scrap metal nickel and chromium content, and the value of the hourly emission factor for the plasma cutter, and any correspondence sent with regards to changes in metal content and the hourly emission factor.

b. To demonstrate compliance with Section 5.1.3., a person designated by a Responsible Official or Authorized Representative shall maintain copies of vendor information detailing the guaranteed collection efficiencies of the control devices listed in Section 5.1.3.

c. To demonstrate compliance with Section 5.1.3., a person designated by a Responsible Official or Authorized Representative shall keep a record of all maintenance work performed on the control devices listed in Section 5.1.3.

d. To demonstrate compliance with Section 5.1.4., a person designated by a Responsible Official or Authorized Representative shall maintain a record of hours of operation and twelve-month-rolling totals of scrap metal processing rates for the equipment listed in Section 5.1.4.

e. To demonstrate compliance with Sections 5.1.5., 5.1.10., 5.1.13., and 5.1.14., a person designated by a Responsible Official or Authorized Representative shall maintain a record of hours of operation and time of operation of the control devices listed in Sections 5.1.5., 5.1.10., 5.1.13., and 5.1.14.

f. To demonstrate compliance with Section 5.1.7., a person designated by a Responsible Official or Authorized Representative shall maintain copies of vendor information detailing the maximum design heat input (DHI) rates of the burner equipment listed in Section 5.1.7., and any correspondence sent with regards to changing the DHI rates.

g. All records required by this permit shall be maintained for a period of five (5) years on site or in a readily accessible off-site location maintained by the permittee. Said records shall be readily available to the Director of the Division of Air Quality or his/her duely authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

5.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit, and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

5.4.2. **Equipment Maintenance Records.** The permittee shall maintain maintenance records relating to failure and/or repair of process equipment covered in this permit. In the event of equipment or system failure, these records shall document the permittee's efforts to maintain proper and effective operation of such equipment and/or systems.

5.4.3. **Certification of Information.** Any application form, report, or compliance certification required by this permit to be submitted to the Division of Air Quality and/or USEPA shall contain a certification by the responsible official that states that, based on information and beliefs formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

5.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

5.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

5.4.5. **Opacity Records**. The permittee shall maintain records of the monitoring data required in Sections 5.1.17. and 5.1.20., documenting the date and time of each visible emission check, the emission point or equipment /source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned.

The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9.

For an emission source out of service during the normal quarterly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

5.5. Reporting Requirements

5.5.1. Upon observing visible emissions in excess of the opacity limitations, the permittee shall submit a written report, certified by a responsible official, to the Director of the Division of Air Quality within ten (10) days after taking said opacity reading.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] _____ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name and Title _____ _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

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[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.